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13 June 2007

VIA FIRST CLASS U.S. MAIL

Honorable Susan Illston
United States District Court
Northern California
Courtroom 10, 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Moton v. Hanjin Shipping*,
Case No.: 07-01483-SI
Our File No: 2554

Dear Judge Illston:

We have recently dismissed Hanjin Shipping because they were merely the time-charterer of the vessel on which our client, David Moton, was injured. The owner of the vessel was J.P. Samartzis Maritime Enterprises Co. S.A., based in Greece. We accordingly amended the complaint, and are in the process of getting the first amended complaint translated so that we can serve J.P. Samartzis in Greece. We are also, informally, attempting to locate their local counsel.

We are accordingly respectfully requesting a sixty-day continuance of the case conference presently on calendar for Friday, June 22, 2007 to permit the case to be at issue. Thank you.

Sincerely yours,
BIRNBERG & ASSOCIATES

/s/ Cory A. Birnberg
Cory A. Birnberg

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The case management conference has been continued to Friday, September 14, 2007 at 2:00 p.m.

